

## Ecology to Issue Enforcement Order

The Washington State Department of Ecology proposes to issue an Enforcement Order to Cenex Harvest States (CHS) and Union Pacific Railroad Company (UPRR). The Order requires CHS and UPRR, the potentially liable persons (PLPs) to conduct a Remedial Investigation and Feasibility Study at the Grain Handling Facility at Freeman site. The investigation will provide answers about the *carbon tetrachloride and chloroform* contaminants in soil and groundwater, determine sources of the carbon tetrachloride and any other contaminants, and define where contamination is located. The Feasibility Study will identify and evaluate the best methods to clean up the contamination.

The site is generally located at 14603 Highway 27 in Freeman, Spokane County, Washington. Ecology believes the actions required by this Order are in the public interest.



Looking South at the Grain Handling Facility

## Ecology Wants Your Comments

You are invited to review and comment on the Enforcement Order, Scope of Work, Public Participation Plan, and State Environmental Policy Act (SEPA) and Determination of Non-Significance (DNS) for the site.

**Comments may be sent to Patrick Cabbage October 1 through November 2, 2015.** Patrick's contact information and the locations to review documents are listed in the box on the right.

Ecology attempted to negotiate an Agreed Order with the PLPs, however, CHS and UPRR chose to not participate in Order negotiations or sign the Agreed Order. The Enforcement Order requires the PLPs to complete three main tasks:

1. Develop a Project Plan, including RI Work Plan, Sampling and Analysis Plan, and Health and Safety Plan
2. Conduct RI Field Investigations
3. Prepare Remedial Investigation/Feasibility Study Report

### Comments Accepted

**October 1 through November 2, 2015**

To request **ADA** accommodations or materials in a format for the visually impaired call Mike Hibbler 509/329-3568, Relay Service at 711, or TTY 877-833-6341.

### Comments and Technical Questions

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### Document Review Locations

WA Department of Ecology  
Kari Johnson, Public Disclosure  
4601 N. Monroe  
Spokane, WA 99205-1295  
Call for appointment  
509/329-3415

Fairfield Library  
305 East Main St.  
Fairfield, WA 99012  
(509) 893-8320

Moran Prairie Library  
6004 S. Regal Street  
Spokane, WA 99223  
509/893-8340

Spokane Valley Library  
12004 E. Main Avenue  
Spokane, WA 99206  
509/893-8400

Facility Site ID No. 77319379  
Cleanup Site ID No. 12540

## Identification of Contamination at the Freeman School District

The Freeman School District routinely samples the well that supplies drinking and irrigation water for the elementary, middle, and high schools. A chemical called carbon tetrachloride was detected at very low levels in the well water in January 2001. These low levels did not exceed the state drinking water standards.

Testing continued and detections of the chemical were sporadic. In 2008 carbon tetrachloride levels exceeded drinking water standards and actions needed to be taken to address the contamination. In our experience this generally occurs when contamination begins to move from the source through the ground.

## Actions Taken to Address Contamination in the Freeman School District Well

The Freeman School District obtained a residential property, known as the Marlow property, as part of the district expansion which was unrelated to the contamination issue. A water supply well on that property was tested in the hopes it could be a substitute well for the district. However, it also showed carbon tetrachloride at levels too high to consider as an alternate source of water.

The school district applied for and received grant dollars from the WA Department of Health to further investigate the problem. In August 2013 an air stripper treatment system was installed to remove (strip) volatile organic compounds such as carbon tetrachloride from the drinking water. The water treatment continues to be successful. The District continues to monitor drinking water each month and sampling has met all state and federal drinking water requirements for the past 18 months.

## Cleanup to be Coordinated with Harvest

Ecology will make every effort to take harvest activities into consideration. A schedule of the cleanup will be more clearly defined as more information is obtained. Ecology will work with the Grain Handling Facility and local farmers/organizations regarding schedules.

## How are Cleanup Costs Paid?

Under the Model Toxics Control Act (MTCA), which guides cleanup of contaminated sites in the State of Washington, past and present property owners and operators are responsible to pay for cleanup of contaminants. Cenex Harvest States and Union Pacific Railroad Company are identified as potentially liable persons (PLPs) responsible for contributing toward the cost of cleanup at this site.

## Contaminants of Concern

Currently, we know carbon tetrachloride and chloroform have been found in soil and groundwater at levels that exceed the standards for the State of Washington. The Remedial Investigation will identify where contamination is located and the Feasibility Study will identify and evaluate options to clean up the contamination.

### What is Carbon Tetrachloride?

It is a man-made chemical that does not break down quickly in the environment. It was widely used as an agricultural pesticide and fumigant to kill insects and rodents in grain storage facilities. It was also used to make refrigerants and propellants for aerosol cans, metal degreasing, as a dry cleaning agent and other uses. In 1985 the EPA banned the use of carbon tetrachloride for agricultural and other uses except some industrial applications.

### Why is Chloroform found at the Site?

Chloroform is a byproduct of the breakdown of carbon tetrachloride. Chloroform is used to make other chemicals and can also be formed in small amounts when chlorine is added to water.

## The Cleanup Process

The following is a general outline of the cleanup process. There may be variables at a site that may require additional steps. Sometimes steps are combined, if appropriate, to move the cleanup forward more quickly.

This fact sheet focuses on the Enforcement Order for the Remedial Investigation and Feasibility Study and associated documents. This begins the formal phase of cleanup and the first 30-day comment period. Ecology will respond to comments received and modify the documents if necessary.

Next, reports from the Remedial Investigation and Feasibility Study will be made available for a 30-day comment period. Public comment is considered, and then if no changes are made, the documents become final. After the documents become final, if no interim actions are necessary to protect the public and environment, a draft Cleanup Action Plan (DCAP) is prepared by Ecology and sent out for public comment. The DCAP identifies and evaluates the cleanup alternative(s) Ecology selected.

Environmental impacts of the project also are considered and a State Environmental Policy Act and determination of non-significance is made available for public review along with the DCAP

After the cleanup is completed there is generally long-term monitoring and every five years a periodic review is conducted to determine the continued effectiveness of the cleanup.

## What Happens Now?

You may review the Enforcement Order, Scope of Work, and Public Participation Plan. Send your comments to Patrick Cabbage at Ecology by **November 2, 2015**. Ecology will review the comments and modify the documents if warranted.



Figure 1 Grain Handling Facility at Freeman